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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,) NO. 3:23-CR-00182-JD
13 Plaintiff,)
14 v.) STIPULATION TO CONTINUE CHANGE OF
15) PLEA AND EXCLUDE TIME FROM APRIL 8,
16 GIOVANNI VASSALO,) 2024 THROUGH APRIL 22, 2024 AND
17 Defendant.) [PROPOSED] ORDER
18 _____)

19 It is hereby stipulated by and between counsel for the United States and counsel for the defendant
20 Giovanni Vassalo, that the change of plea hearing set for April 8, 2024 be continued to April 22, 2024
21 because the defendant has been arrested and is in state custody. It is further stipulated that time be
22 excluded under the Speedy Trial Act from April 8, 2024 through April 22, 2024.

23 The government and counsel for the defendant agreed that time be excluded under the Speedy
24 Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery already
25 produced. For this reason and as further stated on the record at the status conference, the parties stipulate
26 and agree that excluding time until April 22, 2024 will allow for the effective preparation of counsel. *See*
27 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by
28 excluding the time from April 8, 2024 through April 22, 2024 from computation under the Speedy Trial
STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER
3:23-CR-00182-JD

1 Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),
2 (B)(iv).

3 The undersigned Assistant United States Attorney certifies that she has obtained approval from
4 counsel for the defendant to file this stipulation and proposed order.

5
6 IT IS SO STIPULATED.

7 DATED: April 5, 2024

8
9 /s/
10 KELSEY C. DAVIDSON
11 Assistant United States Attorney

12 DATED: April 5, 2024

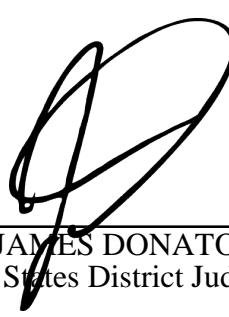
13 /s/
14 PANAGIOTIS PROUNTZOS
15 Counsel for Defendant Giovanni Vassalo

16
17 [PROPOSED] ORDER

18 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court
19 continues the change of plea to April 22, 2024 and finds that failing to exclude the time from April 8, 2024
20 through April 22, 2024 would unreasonably deny defense counsel and the defendant the reasonable time
21 necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
22 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from April
23 8, 2024 through April 22, 2024 from computation under the Speedy Trial Act outweigh the best interests
24 of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS
25 HEREBY ORDERED that the change of plea is continued from April 8, 2024 to April 22, 2024 and that
26 time from April 8, 2024 through April 22, 2024 shall be excluded from computation under the Speedy
Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

27
28 IT IS SO ORDERED.

DATED: 4/10/2024


HON. JAMES DONATO
United States District Judge